Steven T. Wax, OSB No. 85012 Federal Public Defender 101 SW Main Street, Suite 1700 Portland, OR 97204 Tel: (503) 326-2123

Fax: (503) 326-5524

Email: steve_wax@fd.org

Lawrence Matasar, OSB No. 74209 621 SW Morrison Street, Suite #1025 Portland, OR 97205

Tel: (503) 222-9830

Email: larry@pdxlaw.com

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

No. 6:05-cr-60008-AA

Plaintiff,

v.

PIROUZ SEDAGHATY,

MOTION FOR ORDER TO MODIFY PROTECTIVE ORDER OF DECEMBER 18, 2007

Defendant.

Defendant, Pirouz Sedaghaty, by and through his attorneys, Lawrence Matasar and Federal Public Defender Steven T. Wax, hereby moves this Court for modification of the Protective Order entered on December 18, 2007. This motion

Page 1 MOTION FOR ORDER TO MODIFY PROTECTIVE ORDER OF DECEMBER 18, 2007

is necessary to clarify the limits on Mr. Sedaghaty's criminal defense attorneys' provision of material to civil attorneys representing AHIF-Ashland in civil proceeding United States District Court Southern District of New York *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (see attached correspondence and order).

The government agrees with the requested modification.

RESPECTFULLY SUBMITTED this 14th day of February, 2013.

/s/ Steven T. Wax

Steven T. Wax

Federal Public Defender

/s/ Lawrence H. Matasar

Lawrence H. Matasar